# EXHIBIT 9

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAY	VARI	Ε
	- X	
In re:	§	Chapter 11
W. R. GRACE & CO., <u>et al.</u> ,	§ §	Case No. 01-01139 (JKF)
Debtors.	§	Jointly Administered
	- X	
THE SCOTTS COMPANY,	Ş	
Plaintiff,	§ §	
V.	§ 8	Adv. Pro. No.
AMERICAN EMPLOYERS	§ §	
INSURANCE COMPANY; BOSTON OLD	§	
COLONY INSURANCE COMPANY; CONTINENTAL	§	
CASUALTY COMPANY; EMPLOYERS COMMERCIAL	§	
UNION N/K/A ONEBEACON AMERICA	§	
INSURANCE COMPANY; MARYLAND	§	
CASUALTY COMPANY; UNIGARD	§	
INSURANCE COMPANY,	§	
	§	
– and –	§	
W. R. GRACE & CO., et al., Debtors. <sup>1</sup>	\$ \$ \$	
Y. K. GRACL & CO., G. al., Debiols.	§	

### COMPLAINT FOR DECLARATORY AND OTHER RELIEF

Defendants.

The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food >N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Plaintiff The Scotts Company ("Plaintiff" or "Scotts"), by and through its counsel, alleges as follows:

### Introduction

- 1. This is an insurance coverage action for declaratory relief, pursuant to United States Bankruptcy Rule 7001.
- 2. Plaintiff seeks declaratory and other relief with respect to the liability insurance policies sold to W. R. Grace & Co. (the "Debtors" or "W. R. Grace") by the Insurance Defendants (all defendants except for the Debtors are collectively referred to as the "Insurance Defendants"). The policies obligate the Insurance Defendants to provide coverage to Plaintiff for asbestos-related liabilities that have arisen or may arise in connection with W. R. Grace vermiculite sold by Scotts.
- 3. The Insurance Defendants' duties under the policies include the obligations to defend, investigate, and indemnify Plaintiff with respect to asbestos-related bodily injury claims asserted against Plaintiff in multiple jurisdictions (the "BI Actions").

### **The Parties**

- 4. The Scotts Company is an Ohio corporation with its principal place of business in Marysville, Ohio. Scotts is referred to herein as "Plaintiff."
- 5. Defendant American Employers Insurance Company ("American Employers") is a Massachusetts corporation with its principal place of business in Boston, Massachusetts.
- 6. Defendant Boston Old Colony Insurance Company ("Boston Old") is a Massachusetts corporation with its principal place of business in Chicago, Illinois.
  - 7. Defendant Continental Casualty Company ("Continental Casualty") is an

Illinois corporation with its principal place of business in Chicago, Illinois.

- 8. Defendant Employers Commercial Union n/k/a OneBeacon America Insurance Company ("Employers Commercial") is a Massachusetts corporation with its principal place of business in Boston, Massachusetts.
- 9. Defendant Maryland Casualty Company ("Maryland Casualty") is a Swiss corporation with its principal place of business in Schaumburg, Illinois.
- 10. Defendant Unigard Insurance Company ("Unigard") is a Washington corporation with its principal place of business in Bellevue, Washington.
- 11. Each of the foregoing Insurance Defendants is and, at all time relevant hereto was, engaged in the business of selling liability insurance.
- 12. Defendant W. R. Grace & Co., et al. ("W. R. Grace") purchased liability insurance policies from the foregoing Insurance Defendants and has claimed an interest in the proceeds of such policies.
- 13. Upon information and belief, W. R. Grace purchased liability insurance policies from other insurers. To the extent those policies extend coverage to Plaintiff for the BI Actions, Plaintiff will seek leave to join those insurers, once their identity is known.

### **Jurisdiction**

- 14. Jurisdiction over this adversary proceeding is proper pursuant to 28 U.S.C. § 1134 and 28 U.S.C. § 157.
- 15. Venue over this adversary proceeding is proper pursuant to 28 U.S.C. § 1409.
- 16. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O).

### **Procedural History**

- 17. On April 2, 2001 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. Since the Petition Date, the Debtors have continued to operate their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
- 18. On January 22, 2002, this Court entered an order (the "Injunction Order") that stays and enjoins actions "for which there <u>may</u> be coverage under the Insurance Policies," which Insurance Policies are defined in the Injunction Order as "those insurance policies that may provide coverage for asbestos-related claims asserted against the Debtors." <u>See Exhibit A, Injunction Order, p. 3 at ¶¶ 9, 10.b.</u> (emphasis added). The Injunction Order further stays and enjoins actions "against Insurance Carriers alleging coverage for asbestos-related liabilities." <u>Id.</u>, at ¶ 10.d.
- 19. On July 22, 2004, this Court entered an Order Denying the Expedited Motion of the Scotts Company for an Order (I) Enforcing the Debtors' Preliminary Injunction and Automatic Stay to Enjoin Prosecution of Certain Asbestos-Related Actions against The Scotts Company and (II) Finding all such Actions Commenced Post-Petition Void *Ab Initio* (the "July 2004 Order"). See Exhibit B, July 2004 Order.
- 20. In its July 2004 Order, this Court prohibited "[t]he Insurance Carriers as to which Scotts makes a claim on shared insurance . . . from paying those claims <u>until the issue of coverage is litigated in an appropriate forum</u>." <u>Id.</u>, at ¶ 2 (emphasis added).
- 21. In response to this Court's July 2004 Order, Plaintiff hereby seeks to litigate the issue of coverage in this forum.

### Nature of Causes of Action

- 22. Many of the Insurance Policies addressed by the Injunction Order extend coverage to vendors of W. R. Grace's products, including Plaintiff (the "Shared Insurance Policies"). A list of the Shared Insurance Policies of which Plaintiff is presently aware is attached to the Injunction Order as Exhibit B.<sup>2</sup> (See Exhibit A hereto).
- 23. The Shared Insurance Policies include, but are not limited to, the following:
  - The Maryland Casualty Company Primary Policies (1967-73). Maryland Casualty Company issued two, three-year primary-layer policies of comprehensive general liability insurance to W. R. Grace. The first policy, policy no. 31-278301, covers the period from June 30, 1967 to June 30, 1970. The second policy, policy no. 31R-911051, covers the period from June 30, 1970 to June 30, 1973. Both policies extend coverage to "Any person or organization (herein referred to as 'vendor'), as an Insured, but only with respect to the distribution or sale in the regular course of the vendor's business of the named insured's products . . . ."
  - (b) The Umbrella Policies above the Maryland Casualty Primary Policies (1967-73). During the period of the Maryland Casualty Company Primary Policies referenced above, W. R. Grace purchased first-layer umbrella policies from American Employers Insurance Company (policy nos. A16-8220-001 and A16-8220-003) and Employers Commercial Union Insurance Company (policy no. EY-8220-005). All three umbrella policies afford coverage to "any other person or organization who is an additional Insured under any underlying policy of insurance . . . ." Plaintiff qualifies as an insured under these umbrella policies, because it is an additional insured under the Maryland Casualty Company Primary Policies.
  - (c) The Excess Policies above the Maryland Casualty Primary Policies (1967-73). Upon information and belief, the upper-layer excess liability policies sold to W. R. Grace for this period contain provisions specifying that those policies "follow form" to the terms of the underlying umbrella policy. Thus, the upper-layer excess policies issued to W. R. Grace likely follow form to the terms of the umbrella policy issued by American Employers or

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Because of the voluminous nature of the Shared Insurance Policies, complete copies of those policies have not been attached to this Complaint. Exhibit B to the Injunction Order contains a list of the Shared Insurance Policies, the policy numbers, and the effective dates of said policies.

- Employers Commercial Union. Because Plaintiff qualifies as an insured under the umbrella policies, it also qualifies as an insured under W. R. Grace's upper-layer excess policies.
- (d) The Continental Casualty Insurance Company Primary Policies (1973-79). In addition to the primary policies issued by Maryland Casualty, Continental Casualty Insurance Company sold two, three-year primary policies to W. R. Grace, covering the period from June 30, 1973 to June 30, 1976 (policy no. 902-36-70), and from June 30, 1976 to June 30, 1979 (policy no. 248-3440). Upon information and belief, both Continental Casualty policies contain the identical "additional insured" language found in the Maryland Casualty policies. As a result, Plaintiff is as an additional insured under the Continental Casualty policies as a vendor of W. R. Grace's vermiculite products.
- The Umbrella Policies above the Continental Casualty Primary Policies (1973-79). The first-layer umbrella policies during this period were issued by Employers Commercial Union, Unigard Mutual, and various London-based insurers. The Employers Commercial Union policy is the same policy that was issued during the period of the Maryland Casualty primary policies, and affords coverage to "any other person or organization who is an additional Insured under any underlying policy of insurance . . . ." The Unigard policy, policy no. 1-2517, contains identical language. Upon information and belief, the umbrella policies issued by the London-based insurers contain similar language. To the extent that Plaintiff is as an insured under the primary-layer Continental Casualty policies, it is also an insured under the first-layer umbrella policies.
- The Excess Policies above the Continental Casualty Primary Policies (f) (1973-79). Plaintiff is also an insured under the excess policies purchased by W. R. Grace during this period. For example, Boston Old Colony issued an excess policy of insurance to W. R. Grace, policy no. LX 2 666 569, covering the period from June 30, 1974 to June 30, 1977. The policy is part of a quota share layer of \$25 million which attaches at \$75 million. An endorsement to the policy states that the "policy is hereby amended to follow all the terms, conditions, definitions and exclusions of the first umbrella policy (Insurer - Unigard Mutual Insurance Company, policy no. 1-2517) and all renewal and replacements thereof." Because Plaintiff qualifies as an insured under the Unigard policy, it likewise qualifies as an insured under the Boston Old Colony policy. Moreover, upon information and belief, all of the other policies sharing this excess layer contain comparable, if not identical, language, as do the other upper-layer excess policies purchased by W. R. Grace from June 30, 1973 to June 30, 1979.

- 24. Beginning in approximately 1960 and continuing for some forty years, Plaintiff purchased vermiculite from W. R. Grace for resale to customers. Most of the vermiculite that W. R. Grace sold to Plaintiff from the early 1960s until 1980 came from the W.R. Grace mine at Libby, Montana ("Libby"). It was ultimately determined that some of the Libby vermiculite that W. R. Grace sold to Plaintiff may have contained asbestos.
- 25. In the BI Actions, Plaintiff is currently defending asbestos-related bodily injury claims arising out of the W. R. Grace vermiculite Plaintiff sold in the marketplace. Seventy-six of these BI Actions involving approximately 4,192 plaintiffs were filed following the Petition Date.
- 26. In connection with the BI Actions, Plaintiff has incurred expenses and will continue to expend substantial amounts of money (the "Defense Expenses") in defense of claims alleging bodily injury to third parties arising out of the W. R. Grace vermiculite sold by Scotts.
- 27. Because the allegations against Plaintiff in the BI Actions are premised on the purported asbestos found in the W. R. Grace vermiculite sold by Plaintiff, Plaintiff has a right to coverage under these Shared Insurance Policies.
- 28. Plaintiff hereby tenders the BI Actions to the Insurance Defendants for defense and indemnity in accordance with the terms of their respective insurance policies.

### **<u>COUNT ONE</u>** (Declaratory Judgment against all Insurance Defendants)

- 29. The averments of paragraphs 1 through 28 hereof are incorporated by reference as if herein set forth at length.
- 30. Pursuant to the terms of their respective policies, each Insurance Defendant is obligated, *inter alia*, to defend Plaintiff, to pay Plaintiff's defense costs, including the costs of investigation, and to indemnify Plaintiff in connection with claims by third parties

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alleging liability of the Plaintiff for damages because of bodily injury incurred in connection with W. R. Grace products sold by Plaintiff.

- 31. The claimants in the BI Actions allege that such bodily injuries as hereinabove described occurred during some part of the policy years during which the Shared Insurance Policies were in effect.
- 32. All conditions precedent to recovery under the Shared Insurance Policies referenced in Exhibit B have been satisfied or waived.
- 33. An actual controversy currently exists among Plaintiff and the Insurance Defendants with respect to their duties and obligations under the Shared Insurance Policies in that Plaintiff contends:
  - (a) Each Insurance Defendant has a duty to provide Plaintiff with a full defense and to pay all defense costs incurred in connection with the BI Actions in which bodily injury potentially occurred during its respective policy period;
  - (b) Each Insurance Defendant has a duty to indemnify Plaintiff for all sums that Plaintiff may be obligated to pay as damages in the BI Actions in which bodily injury occurred during its respective policy period; and
  - (c) In the event that more than one of the Insurance Defendants owes Plaintiff defense and/or indemnity, Plaintiff is entitled to select the insurance policy and policy years which will be accessed to provide such defense and/or indemnity payments.
- 34. Upon information and belief, each Insurance Defendant disputes one or more of Plaintiff's contentions set forth in the immediately preceding paragraph.
- 35. Declaratory relief from this Court will resolve some or all of said disputes and controversies.
- 36. Pursuant to 28 U.S.C. § 2201, Plaintiff is entitled to a declaration by this Court of its rights and the Insurance Defendants' duties. A judicial declaration is necessary to

determine Plaintiff's rights and the Insurance Defendants' duties regarding the Shared Insurance Policies and their applicability to the BI Actions. Pursuant to 28 U.S.C. § 2202, this Court may also grant further necessary or proper relief as it deems appropriate.

WHEREFORE, Plaintiff demands judgment in its favor against the Insurance Defendants:

- (1) requiring each Insurance Defendant to defend and to indemnify Plaintiff against all liability, loss, or expense caused by reason of the claims hereinabove described;
- (2) granting Plaintiff specific performance of the contracts of insurance issued by the Insurance Defendants;
- (3) declaring and adjudging the rights and obligations of the parties under the respective insurance policies issued to W. R. Grace with respect to past and future liabilities of Plaintiff arising from claims allegedly based upon the events hereinabove described;
  - (4) for costs of suit;
  - (5) for counsel fees; and
- (6) for such other and further relief, including any appropriate equitable relief, as the Court may deem just and proper.

Dated: September 2, 2004

MORRIS, NICHOLS, ARSHT & TUNNELL

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Attorneys for Plaintiff
The Scotts Company

425728v3

## EXHIBIT A

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)
W. R. GRACE & CO., <u>et al.</u> ,	) Chapter 11
Debtors.	Case No. 01-01139 (JKF) (Jointly Administered)
W.R. GRACE & CO., et al.,	) ) )
Plaintiffs,	) )
-against-	) ) Adversary No. A-01-771
MARGARET CHAKARIAN, et al. and JOHN DOES 1-1000,	) )
Defendants.	, ) )

### ORDER GRANTING MODIFIED PRELIMINARY INJUNCTION

This matter came on for hearing on January 3, 2002 on the motion of W.R. Grace & Co. and certain of its subsidiaries (collectively, the "Debtors"), to modify the Preliminary Injunction staying all asbestos-related and fraudulent transfer claims against Affiliated Entities. On June 21, 2001, the Debtors, as plaintiffs in this adversary proceeding, filed a Amended Verified Complaint seeking entry of a preliminary injunction pursuant to Section 105(a) of the Bankruptcy Code and 28 U.S.C. § 1651 enjoining the commencement and/or further prosecution of the Actions against Affiliated Entities, as defined below.

A temporary restraining order ("TRO") was entered on April 2, 2001 enjoining the commencement or prosecution of Asbestos Actions against the Affiliated Entities. On April 12, 2001, the Court extended the TRO until April 24, 2001. On April 18, 2001, the Court set this



matter for a preliminary injunction hearing on May 3, 2001, and entered a preliminary injunction barring the commencement or prosecution of Asbestos Actions against the Affiliated Entities until that time. On May 3, 2001, the Court granted Debtors' motion for a preliminary injunction, as modified in their reply brief, and issued a preliminary injunction barring the prosecution of currently pending asbestos-related actions and fraudulent transfer actions against certain affiliates of Debtors. Debtors have now moved to modify that preliminary injunction to add several additional claims and parties and to reinstate the bar against the commencement of new Actions against Affiliated Entities.

The following terms are defined for purposes of this Order:

- 1. "Fresenius" means National Medical Care, Inc.; Fresenius A.G.; Fresenius, U.S.A., Inc.; Fresenius Medical Care A.G.; and Fresenius National Medical Care Holdings, Inc.
- "Sealed Air" means Sealed Air Corporation, Sealed Air Corporation (US),
   Cryovac, Inc., and Sealed Air (Canada) Inc.
- 3. "Merrill Lynch" means Merrill, Lynch, Pierce, Fenner & Smith, Inc. ("Merrill Lynch").
  - 4. "CSFB" means Credit Suisse First Boston Corporation.
- 5. "Non-Debtor Affiliates" means affiliates of the Debtors that are not filing entities for purposes of these chapter 11 cases, as well as present and former officers, directors and employees of Debtors. The Non-Debtor Affiliates are listed in Exhibit A hereto.
- 6. "Insurance Carriers" means Maryland Casualty Company, Continental Casualty Company, their affiliates and any other insurer of the Debtors under the Insurance Policies as

outlined on Exhibit B hereto who has been named as a defendant in actions pending in direct action states.

- 7. "Robinson" means Robinson Insulation, Co.
- 8. "Affiliated Entities" means Fresenius, Sealed Air, Merrill Lynch, CSFB,
  Insurance Carriers, Robinson and the Non-Debtor Affiliates. The Affiliated Entities are listed in
  Exhibit A.
- 9. The "Insurance Policies" are those insurance policies that may provide coverage for asbestos-related claims asserted against the Debtors. The Insurance Policies include those listed in Exhibit B.
- 10. The "Actions" means pending actions and actions that have not been filed or are not pending as of the date of entry of this Order as follows:
  - a) against Affiliated Entities that arise from alleged exposure to asbestos indirectly or directly allegedly caused by Debtors; or
    - b) for which there may be coverage under the Insurance Policies; or
  - c) against Affiliated Entities alleging fraudulent transfer or fraudulent conveyance claims;
  - d) against Insurance Carriers alleging coverage for asbestos-related liabilities;
     or
  - e) against current or former officers, directors or employees of Debtors that arise out of such officer's, employee's or director's employment or relationship with Debtors except the action entitled Robert Locke v. W. R. Grace and Robert Bettacchi, No.

99-2530 (Mass. Sup. Ct., Middlesex Cty) wherein the Debtors request for an injunction is continued to January 29, 2002 at 1:00 p.m. for further hearing.

The definition of "Actions" does not include the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police and regulatory power, including the enforcement of a judgment other than a money judgment, obtained in an action or proceeding by the governmental unit to enforce such governmental unit's police or regulatory power, as outlined in section 362(b)(4) of the Bankruptcy Code.

In support of this Order, the Court finds that:

- 1. Without the injunctive relief sought, the Debtors would suffer the risk of irreparable harm, including potential diminution of estate property; and
- 2. The injunctive relief requested is in the best interests of the Debtors and their estates, creditors and other parties in interest;
  - 3. This proceeding is a core proceeding pursuant to 28 U.S.C. § 158(a); and
- 4. This Order is without prejudice to the Debtors' or others' rights to seek relief pursuant to the automatic stay under 11 U.S.C. § 362.

After due deliberation and cause appearing therefore, accordingly:

IT IS HEREBY ORDERED that the prosecution of all of the following actions are stayed and enjoined pending a final judgment in this adversary proceeding or further order of this Court:

a. all Actions as defined above. Any additional Actions that are filed and served upon Affiliated Entities are, upon completion of service, stayed and enjoined pending a final judgment in this adversary proceeding or further order of this Court;

- b. the action entitled <u>TIG Ins. Co. v. Smolker</u>, No. BC 173952 (Los Angeles County Superior Court) and all related appeals pending in the California Court of Appeals, Second Appellate District, consolidated as No. B 138229, in their entirety;
- c. the State of Michigan, Dept. of Corrections' (the "State") third party action against Grace Dearborn Company and Betzdearborn, Inc. in the case entitled Ruppel K.

  Perry v. State of Michigan, Dept. of Corrections v. Grace Dearborn Company,

  predecessor company of Betzdearborn, Inc., No. 95 15855 CM (Mich. Ct. Claims), but the Plaintiff, Ruppel K. Perry is not stayed and enjoined from proceeding with his Complaint against the State;
- d. the action entitled Ellison v. FPC Disposal, Inc., No. CJ-99-151-01, (Okla. Dist. Ct., Canadian Cty.) as to Samson Investment Company, Samson Hydrocarbons Co. and their subsidiaries and affiliates (the "Samson entities") unless plaintiff Ellison identifies in writing to counsel for the Debtors any Samson affiliate not entitled to indemnification by the Debtors and counsel for the Debtors, within 20 days of such notification does not disagree with Ellison. In the event the Debtors disagree with Ellison's identification of a Samson affiliate that is not entitled to indemnification by the Debtors, Ellison shall only proceed against such Samson affiliate by further order of this Court after notice and a hearing;
- e. the action entitled Exxon Corp. v. Samson Hydrocarbons Co., No. CJ-99-390, (Okla. Dist. Ct., Creek Cty.) as to the Samson entities and plaintiff Exxon's Motion for Summary Judgment in this adversary proceeding (Docket No. 72) shall be continued for hearing to January 29, 2002 at 1:00 p.m; and

f. the action entitled <u>Youpee v. Samson Hydrocarbons Co.</u>, No. CV-98-108-BLD-JDS (D. Mont.) which has been conditionally settled in the Montana District Court and is thus stayed and enjoined herein as to the Samson entities only in the event that the conditions to the settlement are not met and the action is not dismissed by the Montana District Court as to the Samson entities.

Dated: January 22, 2002

THE HONORABLE JUDITH K. FITZGERALD. UNITED STATES BANKRUPTCY JUDGE

### Exhibit A

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#### EXHIBIT A

### **AFFILIATED ENTITIES**

#### 1. Fresenius Entities.

- a) National Medical Care, Inc.
- b) Fresenius A.G.
- c) Fresenius, U.S.A., Inc.
- d) Fresenius Medical Care, Inc.
- e) Fresenius National Medical Care, Inc.

### 2. Sealed Air Entities.

- a) Sealed Air Corporation
- b) Sealed Air Corporation (US)
- c) Cryovac, Inc.
- d) Sealed Air (Canada) Inc.

### 3. Other Abner Defendants

- a) Merrill, Lynch, Pierce, Fenner & Smith, Inc.
- b) Credit Suisse First Boston Corporation

### 4. Insurance Carriers

- a) Maryland Casualty Company
- b) Continental Casualty Company
- c) Affiliates of Maryland Casualty Co. and Continental Casualty Co.
- d) Other insurers of the Debtors under the Insurance Policies who have been named as defendants in actions pending in direct action states.

### 5. Robinson Insulation, Co.

### 6. Non-Debtor Affiliates of W.R. Grace & Co.

- a) Advanced Refining Technologies LLC
- b) Advanced Refining Technologies LP
- c) Advanced Refining Technologies Management, Inc.
- d) Carbon Dioxide Slurry Systems LP
- e) Construction Products Dubai, Inc.
- f) Grace Asia Pacific, Inc.
- g) Grace Chemicals, Inc.
- h) Grace Collections, Inc.
- i) Grace Germany Holdings, Inc.
- j) Grace Foundation Inc.

- k) Grace Management Services, Inc.
- 1) Grace Offshore Turnkey
- m) Grace Receivables Purchasing, Inc.
- n) Ichiban Chemical Co., Inc.
- o) Grace Canada, Inc.
- p) Debtors' current and former officers, directors and employees

### Exhibit B

03/31/54 04/01/55 04/01/55 04/01/55 04/01/56 04/01/57 04/01/57 04/01/57 04/01/58 04/01/57 04/01/58 04/01/58 04/01/58 04/01/59 04/01/60 04/01/60 04/01/61 06/01/62 06/01/62 06/01/62 06/01/63 06/01/63 06/01/64 06/01/65 06/01/65 06/01/65 06/01/65 06/01/66 06/01/66 06/01/66 06/01/66 06/01/66 06/01/66 06/01/66 06/01/66 06/01/66 06/01/66 06/01/67 06/30/67 06/30/67 06/30/67 06/30/67 06/30/67 06/30/71 06/30/71 Various Pre-1971 06/30/72 06/30/73 06/30/73 06/30/73 06/30/76 06/30/76 06/30/76 06/30/76 06/30/76 06/30/73 06/30/76 06/30/78	Policy Year <u>Begin End</u> 03/31/53 03/31/54
<ul> <li>Royal Indemnity Company</li> <li>General Insurance Company of America</li> <li>Maryland Casualty Company</li> <li>Continental Casualty Company</li> <li>Continental Casualty Company</li> <li>Continental Casualty Company</li> <li>Continental Casualty Company</li> </ul>	d <u>Insurer</u> //54 Royal Indemnity Company
RLG31840 RLG035805 RLG045762 RLG045836 RLG021629 RLG021620 RLG021622 BLP186027 RLG021622 BLP205359 96-205800 BLP221289 96-224900 BLP260071 96-257400 BLP270815 96-257400 BLP270815 96-269500 31-278301 31-278301 31-R-911051 Unknown 31-R-911051 CCP9023670 CCP2483440 CCP2483440	Policy Number RLG27635
As Per Policy	<u>Limits</u> As Per Policy
Primary Liability	Primary Liability

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	46,500	÷ ↔	288097BB/967111090	British National Ins. Co. Ltd.	10/20/60	40/00/50 65/02/01
	31,000	· 4	596111090/88/60885	Sovereign Marine & Gen'l Ins. Co.	10/20/60	10/20/59
Excess	30,000	• <del>c</del> •	59E11109C/BB760884		10/20/60	10/20/59
Excess	25,000	€9	59E11109B/BB760883	British National Ins. Co. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	21,280	₩.	59E11109A/BB760881	British National Ins. Co. Ltd.	10/20/60	10/20/59
	20,000	ક્ક	59E11109B/BB760883	St. Helens Ins. Co. Ltd.	10/20/60	10/20/59
	13,520	<b>⇔</b>	59E11109A/BB760881	St. Helens Ins. Co. Ltd.	10/20/60	10/20/59
П	155,000	↔	59E11109D/BB760885	Excess Ins. Co. Ltd.	10/20/60	10/20/59
	155,000	€9	59E11109D/BB760885	Andrew Weir Ins. Co. Ltd.	10/20/60	10/20/59
	80,000	↔	59E11109A/BB760881	London & Edinburgh General Ins. Co.	10/20/60	10/20/59
	77,500	↔	59E11109D/BB760885	London & Overseas Ins. Co. Ltd.	10/20/60	10/20/59
	77,500	¢\$	59E11109D/BB760885	River Thames Ins. Co. Ltd.	10/20/60	10/20/59
	62,000	↔	59E11109D/BB760885	World Auxiliary Ins. Corp. Ltd.	10/20/60	10/20/59
	50,000	↔	59E11109C/BB760884	London & Overseas Ins. Co. Ltd.	10/20/60	10/20/59
	50,000	&	59E11109C/BB760884	London & Edinburgh General Ins. Co.	10/20/60	10/20/59
Ξ.	43,400	¢\$	59E11109D/BB760885	Sphere Drake Ins. Co. Ltd.	10/20/60	10/20/59
	30,000	<del>&amp;</del>	59E11109C/BB760884	Andrew Weir Ins. Co. Ltd.	10/20/60	10/20/59
Excess	29,000	↔	59E11109A/BB760881	World Auxiliary Ins. Corp. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	25,000	€	59E11109C/BB760884	Excess Ins. Co. Ltd.	10/20/60	10/20/59
	25,000	↔	59E11109B/BB760883	River Thames Ins. Co. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	25,000	↔	59E11109B/BB760883	Excess Ins. Co. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	25,000	€∌	59E11109B/BB760883	World Auxiliary Ins. Corp. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	23,250	€9	59E11109D/BB760885	United Standard Ins. Co. Ltd.	10/20/60	10/20/59
Excess	22,552	€	59E11109D/BB760885	Alba Gen'l. Ins. Co. Ltd.	10/20/60	10/20/59
Excess Liability Policy	21,622	€9	59E11109D/BB760885	Helvetia Accident Swiss Ins. Co.	10/20/60	10/20/59
Excess	19,320	€9	59E11109A/BB760881	River Thames Ins. Co. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	19,320	<b>&amp;</b> 3	59E11109A/BB760881	Excess Ins. Co. Ltd.	10/20/60	10/20/59
) Excess Liability Policy	15,500	↔	59E11109D/BB760885	Black Sea & Baltic Gen'l Ins. Co.	10/20/60	10/20/59
Excess	14,550	€	59E11109C/BB760884	Alba Gen'l. Ins. Co. Ltd.	10/20/60	10/20/59
	13,950	₩	59E11109C/BB760884	Helvetia Accident Swiss Ins. Co.	10/20/60	10/20/59
Excess	12,500	€9	59E11109B/BB760883	London & Overseas Ins. Co. Ltd.	10/20/60	10/20/59
	10,000	↔	59E11109B/BB760883	United Standard Ins. Co. Ltd.	10/20/60	10/20/59
	10,000	↔	59E11109B/BB760883	Andrew Weir Ins, Co. Ltd.	10/20/60	10/20/59
Excess	10,000	€9	59E11109A/BB760881	Home & Overseas Ins. Co. Ltd.	10/20/60	10/20/59
Excess	9,680	↔	59E11109A/BB760881	Alba Gen'l. Ins. Co. Ltd.	10/20/60	10/20/59
Excess	9,680	<del>S</del>	59E11109A/BB760881	United Standard Ins. Co, Ltd.	10/20/60	10/20/59
	2,325	€	59E11109D/BB760885	Fidelidade Ins. Co. of Lisbon	10/20/60	10/20/59
Excess	1,500	÷	59E11109C/BB760884	Fidelidade Ins. Co. of Lisbon	10/20/60	10/20/59
Excess	1,213	↔	59E11109B/BB760883	Alba Gen'l, Ins. Co. Ltd.	10/20/60	10/20/59
	1,163	\$	59E11109B/BB760883	Helvetia Accident Swiss Ins. Co.	10/20/60	10/20/59
Excess Liability Policy		€9	59E11109B/BB760883	Fidelidade Ins. Co. of Lisbon	10/20/60	10/20/59
Category	Limits		Policy Number	Insurer	End	Begin

155,000 Excess Liability Policy 155,000 Excess Liability Policy 13,520 Excess Liability Policy	<del>69 69 69</del>	59E11109D/BB760885 59E11109A/BB760881	Excess Ins. Co. Ltd.  St. Helens Ins. Co. Ltd.	10/20/61	10/20/60
80,000	<i>A</i> €9	59E11109A/BB760881	London & Edinburgh General Ins. Co.  Andrew Weir Ins. Co. 114	10/20/61	10/20/60 10/20/60
77,500	<b>&amp;</b> &	59E11109D/BB760885	River Thames Ins. Co. Ltd.	10/20/61	10/20/60
62,000 Excess	· 49	59E11109D/BB760885	World Auxiliary Ins. Corp. Ltd.	10/20/61	10/20/60
50,000	↔ .	59E11109C/BB760884	London & Overseas Ins. Co. Ltd.	10/20/61	10/20/60
	€9 -	59E11109C/BB760884	London & Edinburgh General Ins. Co.	10/20/61	10/20/60
	<b>↔</b> ·	59E11109D/BB760885	Sphere Drake Ins. Co. Ltd.	10/20/61	10/20/60
	€9 -	59E11109C/BB760884	Andrew Weir Ins. Co. Ltd.	10/20/61	10/20/60
	<del>69</del> +	59E11109A/BB760881	World Auxiliary Ins. Corp. Ltd.	10/20/61	10/20/60
	<b>⇔</b>	59E11109C/BB760884	Excess Ins. Co. Ltd.	10/20/61	10/20/60
	↔	59E11109B/BB760883	River Thames Ins. Co. Ltd.	10/20/61	10/20/60
	€₽	59E11109B/BB760883	Excess Ins. Co. Ltd.	10/20/61	10/20/60
	€∻	59E11109B/BB760883	World Auxiliary Ins. Corp. Ltd.	10/20/61	10/20/60
	€9	59E11109D/BB760885	United Standard Ins. Co. Ltd.	10/20/61	10/20/60
22,552 Excess	€9	59E11109D/BB760885	Alba Gen'l. Ins. Co. Ltd.	10/20/61	10/20/60
21,622 Excess	↔	59E11109D/BB760885	Helvetia Accident Swiss Ins. Co.	10/20/61	10/20/60
19,320 Excess	<del>69</del>	59E11109A/BB760881	Excess Ins. Co. Ltd.	10/20/61	10/20/60
19,320 Excess	↔	59E11109A/BB760881	River Thames Ins. Co. Ltd.	10/20/61	10/20/60
15,500 Excess	€9	59E11109D/BB760885	Black Sea & Baltic Gen'l Ins. Co.	10/20/61	10/20/60
	<del>69</del>	59E11109C/BB760884	Alba Gen'l. Ins. Co. Ltd.	10/20/61	10/20/60
	↔	59E11109C/BB760884	Helvetia Accident Swiss Ins. Co.	10/20/61	10/20/60
	↔	59E11109B/BB760883	London & Overseas Ins. Co. Ltd.	10/20/61	10/20/60
	↔	59E11109B/BB760883	United Standard Ins. Co. Ltd.	10/20/61	10/20/60
	↔	59E11109B/BB760883	Andrew Weir Ins. Co. Ltd.	10/20/61	10/20/60
	↔	59E11109A/BB760881	Home & Overseas Ins. Co. Ltd.	10/20/61	10/20/60
9,680 Excess	↔	59E11109A/BB760881	Alba Gen'l. Ins. Co. Ltd.	10/20/61	10/20/60
	↔	59E11109A/BB760881	United Standard Ins. Co. Ltd.	10/20/61	10/20/60
5,000 Excess	<del>(A</del>	59E11109B/BB760883	Black Sea & Baltic Gen'l Ins. Co.	10/20/61	10/20/60
2,425 Excess Liability Policy	↔	59E11109B/BB760883	Alba Gen'l. Ins. Co. Ltd.	10/20/61	10/20/60
2,325 Excess	↔	59E11109B/BB760883	Helvetia Accident Swiss Ins. Co.	10/20/61	10/20/60
2,325 Excess	↔	59E11109D/BB760885	Fidelidade Ins. Co. of Lisbon	10/20/61	10/20/60
1,500 Excess	⇔	59E11109C/BB760884	Fidelidade Ins. Co. of Lisbon	10/20/61	10/20/60
250 Excess	↔	59E11109B/BB760883	Fidelidade Ins. Co. of Lisbon	10/20/61	10/20/60
2,162,250 Excess	⇔	59E11109D/BB760885	Lloyds Underwriters	10/20/60	10/20/59
660,000 Excess Liability Policy	↔	59E11109C/BB760884	Lloyds Underwriters	10/20/60	10/20/59
277,500 Excess	↔	59E11109B/BB760883	Lloyds Underwriters	10/20/60	10/20/59
	€9	59E11109A/BB760881	Lloyds Underwriters	10/20/60	10/20/59
125,000 Excess Liability Policy	€9	59E11109C/BB760884	Orion Ins. Co. Ltd.	10/20/60	10/20/59
80,600 Excess	€	59E11109D/BB760885	Orion Ins. Co. Ltd.	10/20/60	10/20/59
77,500 E	↔	59E11109D/BB760885	Orion Ins. Co. Ltd.	10/20/60	10/20/59
67,500 Excess Liability Policy	↔	59E11109B/BB760883	Orion Ins. Co. Ltd.	10/20/60	10/20/59

50,000 Excess Liability Policy	<b>↔</b> ↔	59E11109C/BB760884 59E11109C/BB760884	London & Overseas Ins. Co. Ltd. London & Edinburgh General Ins. Co.	10/20/62 10/20/62	10/20/61 10/20/61
30,000 43,400	<del>6</del> 9 69	59E11109C/BB760884 59E11109D/BB760885	Andrew Weir Ins. Co. Ltd.  Sphere Drake Ins. Co. Ltd.	10/20/62 10/20/62	10/20/61 10/20/61
29,000	· 64	59E11109A/BB760881	World Auxiliary Ins. Corp. Ltd.	10/20/62	10/20/61
25,000 25,000	<b>⇔</b> €	59E11109C/BB760884	Excess Ins. Co. Ltd.	10/20/62	10/20/61
25,000 25,000	e ee	59E11109B/BB760883	River Thames Ins. Co. Ltd.	10/20/62	10/20/61
25,000	₩	59E11109B/BB760883	Excess Ins. Co. Ltd.	10/20/62	10/20/61
23,250	€9	59E11109D/BB760885	United Standard Ins. Co. Ltd.	10/20/62	10/20/61
22,552	↔	59E11109D/BB760885	Alba Gen'l. Ins. Co. Ltd.	10/20/62	10/20/61
21,622	€9	59E11109D/BB760885	Helvetia Accident Swiss Ins. Co.	10/20/62	10/20/61
19,320	↔	59E11109A/BB760881	Excess Ins. Co. Ltd.	10/20/62	10/20/61
19,320	↔ .	59E11109A/BB760881	River Thames Ins. Co. Ltd.	10/20/62	10/20/61
15,500	↔ .	59E11109D/BB760885	Black Sea & Baltic Gen'l Ins. Co.	10/20/62	10/20/61
14.550	€9 -	59E11109C/BB760884	Alba Gen'l. Ins. Co. Ltd.	10/20/62	10/20/61
13,950	↔	59E11109C/BB760884	Helvetia Accident Swiss Ins. Co.	10/20/62	10/20/61
12,500	€9 -	59E11109B/BB760883	London & Overseas Ins. Co. Ltd.	10/20/62	10/20/61
10,000	<b>⇔</b> ∢	59E11109B/BB760883	United Standard Ins. Co. Ltd.	10/20/62	10/20/61
10,000	<del>69</del> (	59E11109B/BB760883	Andrew Weir Ins. Co. Ltd.	10/20/62	10/20/61
10,000	<b>€</b> 9 +	59E11109A/BB760881	Home & Overseas Ins. Co. Ltd.	10/20/62	10/20/61
9,680	€9 +	59E11109A/BB760881	Alba Gen'l. Ins. Co. Ltd.	10/20/62	10/20/61
9.680	€9 4	59E11109A/BB760881	United Standard Ins. Co. Ltd.	10/20/62	10/20/61
5.000	6 <del>4</del> -	59E11109B/BB760883	Black Sea & Battic Gen'l Ins. Co.	10/20/62	10/20/61
2.425	€9 (	59E11109B/BB760883	Alba Gen'l. Ins. Co. Ltd.	10/20/62	10/20/61
2.325	€9 (	59E11109B/BB760883	Helvetia Accident Swiss Ins. Co.	10/20/62	10/20/61
2,325	↔ .	59E11109D/BB760885	Fidelidade Ins. Co. of Lisbon	10/20/62	10/20/61
1.500	€9 -	59E11109C/BB760884	Fidelidade Ins. Co. of Lisbon	10/20/62	10/20/61
	↔	59E11109B/BB760883	Fidelidade Ins. Co. of Lisbon	10/20/62	10/20/61
2,162,250	€9 -	59E11109D/BB760885	Lloyds Underwriters	10/20/61	10/20/60
660.00	⇔	59E11109C/BB760884	Hovds Underwriters	10/20/61	10/20/60
277,50	€	59E11109B/BB760883	Lloyds Underwriters	10/20/61	10/20/60
188.200	<b>69</b>	59E11109A/BB760881	Llovds Underwriters	10/20/61	10/20/60
125,000	€₽	59E11109C/BB760884	Orion Ins. Co. Ltd.	10/20/61	10/20/60
80,600	↔	59E11109D/BB760885	Orion Ins. Co. Ltd.	10/20/61	10/20/60
77,500	€	59E11109D/BB760885	Orion Ins. Co. Ltd.	10/20/61	10/20/60
60,000	€9	59E11109B/BB760883	Orion Ins. Co. Ltd.	10/20/61	10/20/60
46,500	↔	59E11109D/BB760885	St. Helens Ins. Co. Ltd.	10/20/61	10/20/60
46,500	↔	59E11109D/BB760885	British National Ins. Co. Ltd.	10/20/61	10/20/60
31,000	€9	59E11109D/BB760885	Sovereign Marine & Gen'l Ins, Co.	10/20/61	10/20/60
30,000	↔	59E11109C/BB760884	St. Helens Ins. Co. Ltd.	10/20/61	10/20/60
25,000	↔	59E11109B/BB760883	British National Ins. Co. Ltd.	10/20/61	10/20/60
21,280	↔	59E11109A/BB760881	British National Ins. Co. Ltd.	10/20/61	10/20/60
20,000	↔	59E11109B/BB760883	St. Helens Ins. Co. Ltd.	10/20/61	10/20/60

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Minster Ins. Co. Ltd. Andrew Weir Ins. Co. Ltd. Stronghold Ins. Co. Ltd. St. Helens Ins. Co. Ltd. Orion Ins. Co. Ltd. British National Ins. Co. Ltd.	World Auxiliary Ins. Corp. Ltd. Sphere Drake Ins. Co. Ltd. London & Overseas Ins. Co. Ltd. Swiss Union Gen. Ins. Co. Ltd.	INA American Employers American Home Assurance American Reinsurance Co Fireman's Fund	English & American Ins. Co. Ltd. Dominion Ins. Co. Ltd. Lloyds Underwriters American Employers Home Insurance Co	Swiss Union Gen. Ins. Co. Ltd. Andrew Weir Ins. Co. Ltd. Stronghold Ins. Co. Ltd. St. Helens Ins. Co. Ltd. Orion Ins. Co. Ltd. British National Ins. Co. Ltd.	American Home Assurance American Reinsurance Co Fireman's Fund World Auxiliary Ins. Corp. Ltd. Sphere Drake Ins. Co. Ltd. London & Overseas Ins. Co. Ltd. Minster Ins. Co. Ltd. China Llabor Co. Ltd.	Stronghold Ins. Co. Ltd. St. Helens Ins. Co. Ltd. St. Helens Ins. Co. Ltd. Orion Ins. Co. Ltd. British National Ins. Co. Ltd. English & American Ins. Co. Ltd. Dominion Ins. Co. Ltd. Lloyds Underwriters American Employers Home Insurance Co INA American Employers
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496,350 496,400 893,400 148,900 397,100 496,400	99,300 198,500 397,100 496,350	5,000,000 5,000,000 5,000,000 5,000,000	645,300 992,700 4,242,200 5,000,000 5,000,000	496,350 496,400 893,400 148,900 397,100 496,400	5,000,000 5,000,000 5,000,000 99,300 198,500 397,100 496,350	893,400 148,900 397,100 496,400 645,300 992,700 4,242,200 5,000,000 10,000,000
Excess Liability Policy				Excess Liability Policy		

10/20/70 06/30/71 Maryland Casualty Co. 10/20/70 06/30/71 American Employers 06/30/71 06/30/72 Employers Comm'l Union 06/30/71 06/30/72 Home Insurance Co 06/30/71 06/30/72 INA 06/30/71 06/30/72 American Reinsurance Co	10/20/69 10/20/69 10/20/69 10/20/69 10/20/69 10/20/69 10/20/69 10/20/70 10/20/20 10/20 10/20 10/20 10/20 10/20 10/20 10/20 10/20 10/20 10/20 10/20	10/20/67 10/20/68 English & American Ins. Co. Ltd. 10/20/67 10/20/68 Dominion Ins. Co. Ltd. 10/20/67 10/20/68 Lloyds Underwriters 10/20/68 10/20/69 American Employers 10/20/68 10/20/69 Home Insurance Co
EY8220-004 EY8220-004 EY8220005 HEC9919945 XCP3745 M0085374 CE2691919	XS2108 M0085374 XLX1026877 WRG-1 411-4307 914-102502 A-16-8220-004 WRG-1. A-16-8220-003 HEC9304605 XBC1834 XS2108 M0085374 XLX1026877 WRG-1. A-16-8220-004 411-4307. 914/1/4116 A-16-8220-003 HEC9304605 XBC1834 XS2108 M0085374 WRG-1 XLX1026877 411-4307. 914/1/4116 A-16-8220-003 HEC9304605 XBC1834 XS2108 M0085374 WRG-1 XLX1026877 411-4307. 914/1/4116	66/180390 66/180390 66/180390 A-16-8220-003 HEC9304605
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Argonaut Northwest Ins. Co. Walbrook Ins. Co. Ltd. North Atlantic Ins. Co. Ltd. Lloyds Underwriters Federal Insurance Co Harbor Insurance Co Aetna Casualty & Surety Aetna Casualty & Surety Northbrook Ins Co	North Star Reinsurance Centennial Ins Co American Home Assurance American Manufacturers Mutual Highlands Ins. Co. Highlands Ins. Co. Arenaut Northwest Ins. Co.	St. Katherine Ins. Co. Ltd. National Casualty Co. of America London & Edinburgh General Ins. Co. Acc. & Casualty Ins. of Winterthur St. Katherine Ins. Co. Ltd. National Casualty Co. of America Stronghold Ins. Co. Ltd. Turegum Ins. Co. Wausau Insurance Co	Midland Insurance Co Aetna Casualty & Surety Home Insurance Co Mission Insurance Co Highlands Ins. Co. American Home Assurance London & Edinburgh General Ins. Co. Bishopsgate Ins. Co. Ltd.
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Excess Liability Policy		Excess Liability	Excess Liability Policy

06/30/76 06/30/76 05/30/76 05/30/76 05/30/76 06/30/76	06/30/75 06/30/76 Northbrook Ins Co 06/30/75 06/30/76 Boston Old Colony Ins Co 06/30/75 06/30/76 Midland Insurance Co 06/30/75 06/30/76 Aetna Casualty & Surety 06/30/75 06/30/76 Mission Insurance Co	06/30/76 06/30/76 06/30/76 06/30/76 06/30/76 06/30/76	06/30/76 06/30/76 06/30/76 06/30/76 06/30/76 06/30/76	06/30/76 06/30/76 06/30/76 06/30/76 06/30/76 06/30/76 06/30/76 06/30/76	06/30/75 06/30/76 Admiral Insurance 06/30/75 06/30/76 New Hampshire Insurance 06/30/75 06/30/76 Central National Ins Co 06/30/75 06/30/76 Northbrook Ins Co 06/30/75 06/30/76 New Hampshire Insurance 06/30/75 06/30/76 California Union Ins Co 06/30/75 06/30/76 First State Ins Co 06/30/75 06/30/76 Continental Casualty Co.
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5,000,000 5,000,000 11,222 18,703 25,356 31,803	20,000,000 5,000,000 2,000,000 2,000,000 3,000,000	354,708 2,000,000 5,000,000 5,343,000 6,007,500 5,000,000	400,500 400,500 400,500 3,000,000 3,000,000 88,500 199,448	16,500 27,000 53,006 66,483 133,066 177,454 265,931 354,708 399,197	500,000 1,000,000 1,000,000 1,500,000 625,000 250,000 3,500,000 625,000
Excess Liability Policy		Excess Liability		Liability	Excess Liability Policy

06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	06/30/75	00/30/73
06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/77	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	06/30/76	00/30//0
London & Edinburgh General Ins. Co.	National Casualty Co. of America	St Katherine Ins. Co. Ltd.	Continental Casualty Co.	Lloyds Underwriters	Prudential Reinsurance	Walbrook Ins. Co. Ltd.	Lexington Ins. Co.	Bermuda Fire & Marine Ins. Co. Ltd.	Mutual Reinsurance Co. Ltd.	Mentor Ins. Co. (U.K.) Ltd.	St. Katherine Ins. Co. Ltd.	Turegum Ins. Co.	St. Katherine Ins. Co. Ltd.	Stronghold Ins. Co. Ltd.	Assicurazioni Generali S.p.A.	Walbrook Ins. Co. Ltd.	Northbrook Ins Co	Bermuda Fire & Marine Ins. Co. Ltd.	Mutual Reinsurance Co. Ltd.	St. Katherine Ins. Co. Ltd.	St. Katherine Ins. Co. Ltd.	Aetna Casualty & Surety	Federal Insurance Co	Harbor Insurance Co	Lloyds Underwriters	North Atlantic Ins. Co. Ltd.	Walbrook Ins. Co, Ltd.	Argonaut Northwest Ins. Co.	Highlands Ins. Co.	Highlands Ins. Co.	American Home Assurance	American Manufacturers Mutual	Centennial Ins Co	Wausau Insurance Co	Stronghold Ins. Co. Ltd.	Turegum Ins. Co.	National Casualty Co. of America	St. Katherine Ins. Co. Ltd.	Acc. & Casualty Ins. of Winterthur	London & Edinburgh General Ins. Co.	National Casualty Co. of America	rasuua fire o Maille IIIs. Co. Liu.
74DD662C	74DD662C	74DD662C 74DD662C	XUX9156645	76DD1595C	DXC901145	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1595C	76DD1594C	63002048	76DD1594C	76DD1594C	76DD1594C	76DD1594C	01XN608WCA.	79221530	120346	74DD663C	74DD663C	74DD663C	74DD663C	74DD663C	74DD663C	CE3436358	4SG-010001	462013040	053700086732	74DD663C	74DD663C	74DD663C	74DD663C	74DD663C	74DD663C	74DD663C	/#DD003C
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177,622	133,192	53,U56 66,546	000,000,01	1,417,600	1,000,000	524,066	461,200	321,347	279,545	46,000	279,545	276,800	209,497	138,400	46,000	1,298,800	1,000,000	796,400	692,800	692,800	519,200	10,000,000	5,000,000	5,000,000	936,250	479,150	169,681	95,410	59,850	29,925	10,000,000	10,000,000	4,500,000	2,000,000	479,150	479,150	190,963	169,681	127,213	84,888	63,654	47,950
Excess Liability Policy		Excess Liability Policy			Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy		Excess Liability Policy	Excess Liability Policy		Excess Liability Policy					Excess Liability Policy					Excess Liability Policy		Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy		Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy

06/30/77       Afficial Fibrile Assulance       CE3430330       \$ 10,000,000         06/30/77       North Atlantic Ins. Co. Ltd.       74DD663C       \$ 471,250         06/30/77       Lloyds Underwriters       74DD663C       \$ 921,500         06/30/77       Zurich Insurance Co       IRDSR4010       \$ 1,000,000         06/30/77       Federal Insurance Co       79221530       \$ 5,000,000         06/30/77       Aetna Casualty & Surrety       01XN608WCA.       \$ 10,000,000	06/30/76       06/30/77       Wausau Insurance Co       053700086732       \$ 2,000,000 E         06/30/76       06/30/77       Centennial Ins Co       462013040       \$ 4,500,000 E         06/30/76       06/30/77       American Manufacturers Mutual       4SG-010001       \$ 10,000,000 E         06/30/76       06/30/77       American Home Assurance       CE3436358       \$ 10,000,000 E	06/30/77       First State Ins Co       923100       \$ 1,000,000         06/30/77       Yasuda Fire & Marine Ins. Co. Ltd.       74DD663C       \$ 47,250         06/30/77       London & Edinburgh General Ins. Co.       74DD663C       \$ 117,500         06/30/77       Stronghold Ins. Co. Ltd.       74DD663C       \$ 471,250         06/30/77       Turegum Ins. Co.       74DD663C       \$ 471,250	06/30/76       06/30/77       Boston Old Colony Ins Co       LX2566569       \$ 5,000,000 E         06/30/76       06/30/77       Prudential Reinsurance       DXC901147       \$ 2,000,000 E         06/30/76       06/30/77       Midland Insurance Co       1110171611748       \$ 2,000,000 E         06/30/76       06/30/77       Aetna Casualty & Surety       01XN607WCA       \$ 3,000,000 E         06/30/76       06/30/77       Home Insurance Co       HEC4495872       \$ 5,000,000 E         06/30/76       06/30/77       Mission Insurance Co       M81722       \$ 5,000,000 E	06/30/77       First State Ins Co       923099       \$ 2,000,000         06/30/77       First State Ins Co       923099       \$ 2,000,000         06/30/77       Prudential Reinsurance       DXC901146       \$ 1,000,000         06/30/77       Home Insurance Co       HEC4356740       \$ 5,000,000         06/30/77       Northbrook Ins Co       63002049       \$ 17,000,000         06/30/77       Hartford Insurance       10XS100044       \$ 2,000,000         06/30/77       Fireman's Fund       XLX1202930       \$ 2,000,000	06/30/77 Argonaut Northwest Ins. Co. 74DD652C \$ 199,637 06/30/77 Argonaut Northwest Ins. Co. 74DD652C \$ 199,637 06/30/77 Midland Insurance Co 111017056574-7 \$ 2,000,000 06/30/77 Mission Insurance Co M81721. \$ 4,000,000 06/30/77 Lexington Ins. Co. 74DD662C \$ 4,842,500 06/30/77 Hartford Insurance 100XS100043 \$ 2,000,000	
471,250 Excess 921,500 Excess 1,000,000 Excess 5,000,000 Excess 5,000,000 Excess 10,000,000 Excess		1,000,000 Excess 47,250 Excess 117,500 Excess 471,250 Excess 471,250 Excess	\$ 5,000,000 Excess Liability Policy \$ 2,000,000 Excess Liability Policy \$ 2,000,000 Excess Liability Policy \$ 3,000,000 Excess Liability Policy \$ 5,000,000 Excess Liability Policy	Excess Excess Excess Excess	199,637 Excess 355,044 Excess 2,000,000 Excess 4,000,000 Excess 4,842,500 Excess 4,977,700 Excess 2,000,000 Excess	

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4177-7981 77DD1632C 77DD1632C 77DD1632C 77DD1632C DXCDX0252 77DD1632C	77DD1632C 77DD1632C 77DD1632C 77DD1632C 77DD1632C SCLD8093266	77DD1631C 77DD1631C 77DD1631C 77DD1631C DXCDX0251 77DD1631C	77DD1631C 77DD1631C 77DD1631C 77DD1631C 77DD1631C 77DD1631C	76DD1595C 76DD1595C 76DD1595C 76DD1595C 76DD1595C 76DD1595C 76DD1595C 76DD1595C 76DD1595C	76DD1594C 76DD1594C 76DD1594C 76DD1594C 63002048 76DD1594C 76DD1595C 76DD1595C 76DD1595C 76DD1595C
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Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy

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CNA Reinsurance of London Ltd. St. Katherine Ins. Co. Ltd.	Stronghold Ins. Co. Ltd.	Assicurazioni Generali S.p.A.	Walbrook Ins. Co. Ltd.	Northbrook ins Co	Bermuda Fire & Marine Ins. Co. Ltd.	Mutual Reinsurance Co. Ltd.	St. Katherine Ins. Co. Ltd.	St. Katherine Ins. Co. Ltd.	Hartford Insurance	Aetna Casualty & Surety	Federal Insurance Co		Midland Insurance Co	Home Insurance Co	Swiss Reinsurance	Lloyds Underwriters	English & American Ins. Co. Ltd.	Allianz Underwriters Ins	Royale Beige S.A.	North Atlantic Ins. Co. Ltd.	Natl Union Fire Pttsbrgh	Centennial Ins Co	Continental Casualty Co.	Granite State Ins	Insurance Co State of PA	Eisen Und Stahl	AG Belge de 1830	Stranghold Ins. Co. 1 td	Home Insurance Co	Aetna Casualty & Surety	Zurich Insurance Co	Insurance Co State of PA	Natl Union Fire Pttsbrgh	Fireman's Fund	Continental Casualty Co.	Reunion-Adriatica	Northbrook Ins Co	Home Insurance Co	Natl Union Fire Pttsbrgh	Hartford Insurance	Gerling Konzern Ins
76DD1595C 76DD1595C	76DD1595C	76DD1595C	76DD1594C	63002048	76DD1594C	76DD1594C	76DD1594C	76DD1594C	10XS100181	01XN1422WCA	(78) 79221530	XCP12378	XL152467	HEC9531436	ZH/R4020/0601	77DD1826	77DD1826	H00011428	AVB102.	77DD1826	1228593	462-01-68-10	RDX1788118	SCLD80-93292	SEP 396-3996	6-1-31-181-001	AVB102	77DD1826	HEC4495872	01XN1400WCA	IRDSR401072	4177-7982	1228593.	XLX1299553	RDX1788117	EL2046	63003296	HEC4356740	1228593	10XS100176	49/99/6212/01
\$ 195,500	\$ 146,500			<u></u>						-	\$ 5,000,000	-	-	-	\$ 2,500,	\$ 1,690,076			\$ 1,000,000	\$ 402,111	•	4.	-	\$ 1,500,000		\$ 1,000,000			ÇT J	\$ 3.000,000	-	\$ 6,000,		\$ 2,000,000			\$ 17,500,000	\$ 5,000,000		\$ 3,000,000	\$ 1,000,000
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Excess Liability Policy	Liability	Liability	Liability	Liability	Liability		Excess Liability Policy	xcess Liability Policy	Excess Liability Policy	Excess Liability Policy			Excess Liability Policy		Excess Liability Policy	Excess Liability Policy		Excess Liability Policy	Excess Liability Policy	Liability			Excess Liability Policy		Excess Liability Policy	Liability		Excess I jability Policy			Excess Liability Policy	Liability	Liability	Liability			Liability			Excess Liability Policy	Excess Liability Policy

06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/79	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78	06/30/78
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American Int'l Underwriter	Stronghold Ins. Co. Ltd.	St. Ratheline ris. Co. Ltd.	Northbrook Ins Co	Walbrook Ins. Co. Ltd.	Lloyds Underwriters	Lexington Ins. Co.	Mutual Reinsurance Co. Ltd.	Bermuda Fire & Marine Ins. Co. Ltd.	El Paso Ins. Co. Ltd.	Granite State Ins	Kraft Ins. Co. Ltd.	St. Katherine Ins. Co. Ltd.	Walbrook Ins. Co. Ltd.	Northbrook Ins Co	Mutual Reinsurance Co. Ltd.	Bermuda Fire & Marine Ins. Co. Ltd.	El Paso Ins. Co. Ltd.	Kraft Ins. Co. Ltd.	St. Katherine Ins. Co. Ltd.	Hartford Insurance	Employers Mutual Cas Co	Aetna Casualty & Surety	Federal Insurance Co	INA	Home Insurance Co	Swiss Reinsurance	Midland Insurance Co	Lloyds Underwriters	Royale Belge S.A.	American Centennial	Allianz Underwriters Ins	North Atlantic Ins. Co. Ltd.	Natl Union Fire Pttsbrgh	Centennial Ins Co	Birmingham Fire Ins Co	American Int'l Underwriter	AG Belge de 1830	Stronghold Ins. Co. Ltd.	Employers Mutual Cas Co	Home Insurance Co	Aetna Casualty & Surety	Zurich Insurance Co
75101107	79DD1635C	79DD 1635C	53UU5/94 70001/94	79DD1634C	79DD1634C	79DD1634C	79DD1634C	79DD1634C	79DD1634C	61791383	79DD1634C	79DD1634C	79DD1633C	63005793	79DD1633C	79DD1633C	79DD1633C	79DD1633C	79DD1633C	10XS100665	MM0-70349	01XN1847WCA	(79) 79227260	XCP14341	HEC9694110 (CITY)	ZH/R4020/0601	XL147450	78DD1420C	AVB124.	CC000305	H0001428	78DD1420C	1231895	462017826	SE6073371	75100695	AVB124	78DD1420C	MM0-70348	HEC9694108 (CITY)	01XN1846WCA	Z17052/3
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Excess Liability Policy	Liability	Excess Liability Policy	Liability	Excess Liability Policy	Liability	Liability	Excess Liability Policy	Liability	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Liability	Excess Liability Policy	Excess Liability Policy		Liability		Liability	xcess Liability	Excess Liability Policy	Liability	xcess Liability	Excess Liability Policy	Liability	Excess Liability Policy		Excess Liability Policy	xcess	Excess Liability Policy		Excess Liability Policy		Liability	Liability	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy		Excess Liability Policy	Excess Liability Policy	Excess Liability Policy

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Lloyds inderwriters Lloyds Underwriters Midland Insurance Co Home Insurance Co Associated International Federal Insurance Co	Nati Union Fire Pttsbrgh Allianz Underwriters Ins Bermuda Fire & Marine Ins. Co. Ltd. Zurich Insurance Co.	Fireman's Fund Centennial Ins Co	American Int'l Underwriter European General Birmingham Fire Ins Co	Home Insurance Co Hartford Insurance	Nati Union Fire Pttsorgn Granite State Ins	Northbrook Ins Co Reunion-Adriatica	Lloyds Underwriters Transit Casualty	Integrity Insurance Co	Mutual Reinsurance Co. Ltd.	El Paso Ins. Co. Ltd.	American Int'l Underwriter Granite State Ins	Natl Union Fire Pttsbrgh	St. Katherine Ins. Co. Ltd. Kraft Ins. Co. Ltd.	Hartford Insurance	Gerling Konzern Ins	Lexington Ins. Co.	Transit Casualty	Mentor Ins. Co. (U.K.) Ltd.	Mutual Reinsurance Co. Ltd.	Bermuda Fire & Marine Ins. Co. Ltd.	Granite State Ins El Paso Ins. Co. Ltd.
79DD1637C XL147540 HEC9826189 (CITY) AEL00208C (80) 79227260	9/82319 H0001428 DM025 A/B Z17052/A	XLX1370426 462019494	75101109 FU78819413178 SE6073508	HEC9826188 (CITY) 10XS100841	9/82319. 61791386 60/35/200	63005795 EL794120	79DD1636C SCU955192	79DD1636C XL200699	79DD1636C	79DD1636C	75101108 61791385	9782319	79DD1636C	10XS100842	49/99/6340/01	79DD1635C	SCU955191	79DD1635C	79DD1635C	79DD1635C	61791384 79DD1635C
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Liability Liability Liability Liability Liability	Excess Liability Policy Excess Liability Policy Excess Liability Policy	Liability Liability	Excess Liability Policy Excess Liability Policy Excess Liability Policy	Excess Liability Policy Excess Liability Policy	Liability Liability	Excess Liability Policy  Excess Liability Policy		Excess Liability Policy	Liability	Excess Liability Policy	Excess Liability Policy  Excess Liability Policy	Liability	Excess Liability Policy	Liability	Excess Liability Policy	Liability	Excess Liability Policy	Liability	Liability	xcess	Excess Liability Policy Excess Liability Policy

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06/30/81 Lloyds Underwriters 06/30/81 Northbrook Ins Co 06/30/81 Louisville Ins. Co. Ltd. 06/30/81 St. Katherine Ins. Co. Ltd. 06/30/81 Kraft Ins. Co. Ltd. 06/30/81 Winterthur Swiss Ins. C 06/30/81 American Int'l Underwrit				06/30/80 Hartford Insurance 06/30/80 C.A.M.A.T. 06/30/80 Stronghold Ins. Co. Ltd. 06/30/80 European General 06/30/80 Haftpflichtverband 06/30/80 Fireman's Fund 06/30/80 Natl Union Fire Pttsbrgh 06/30/80 Continental Casualty Cc 06/30/80 Dominion Ins. Co. Ltd. 06/30/80 Bermuda Fire & Marine 06/30/80 North Atlantic Ins. Co. L
Lloyds Underwriters Northbrook Ins Co Louisville Ins. Co. Ltd. St. Katherine Ins. Co. Ltd. Kraft Ins. Co. Ltd. Winterthur Swiss Ins. Co. Stronghold Ins. Co. Ltd. American Int'l Underwriter	Bryanston Ins. Co. Ltd. Bermuda Fire & Marine Ins. Co. Ltd. Mutual Reinsurance Co. Ltd. Transit Casualty Lexington Ins. Co. Walbrook Ins. Co. Ltd. English & American Ins. Co. Ltd.	Walbrook Ins. Co. Ltd. Louisville Ins. Co. Ltd. St. Katherine Ins. Co. Ltd. Kraft Ins. Co. Ltd. Winterthur Swiss Ins. Co. Granite State Ins Cie Europeene D'Ass. Industrielles El Paso Ins. Co. Ltd.	Federal Insurance Co Lloyds Underwriters Aetha Casualty & Surety St. Katherine Ins. Co. Ltd. Kraft Ins. Co. Ltd. El Paso Ins. Co. Ltd. Bermuda Fire & Marine Ins. Co. Ltd. Mutual Reinsurance Co. Ltd.	Hartford Insurance C.A.M.A.T. Stronghold Ins. Co. Ltd. European General Haftpflichtverband Fireman's Fund Natl Union Fire Pttsbrgh Continental Casualty Co. Dominion Ins. Co. Ltd. Bermuda Fire & Marine Ins. Co. Ltd. North Atlantic Ins. Co. Ltd.
80DD1643C 63006854 80DD1644C 80DD1644C 80DD1644C 80DD1644C 80DD1644C 75102424	80DD1643C 80DD1643C 80DD1643C 8CU955565 80DD1643C 80DD1643C 80DD1643C	79DD1633C 80DD1643C 80DD1643C 80DD1643C 80DD1643C 6480-5013 80DD1643C 80DD1643C	(80) 79227298 79DD1638C 01XN2306WCA 79DD1633C 79DD1633C 79DD1633C 79DD1633C 79DD1633C 63005793	10XS100843 79DD1638C 79DD1638C FU78819413679 EWI1016 XLX1370427 9782319 RDX1784282 79DD1638C DM025. A/B 79DD1638C 79DD1638C
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	356,816 605,657 641,649 1,000,000 1,201,500 1,461,395 1,599,750		5,000,000 7,997,600 10,000,000 389,600 519,600 259,600 441,600 467,600 1,000,000	
Excess Liability Policy	Excess Excess Excess Excess Excess Excess	Excess Liability Policy		Excess Liability Policy

06/30/81 06/30/81 06/30/81 06/30/81	06/30/80 06/30/81 American Int'l Underwriter 06/30/80 06/30/81 Birmingham Fire Ins Co 06/30/80 06/30/81 European General	06/30/81	06/30/81	06/30/81	06/30/80 06/30/81 Gibraltar Cas Co	06/30/81	06/30/81	06/30/80 06/30/81 Northbrook Ins Co	06/30/80 06/30/81 Transit Casualty	06/30/81	_	06/30/81	06/30/81	06/30/81	06/30/80 06/30/81 Bryanston Ins. Co. Etc.	06/30/81	06/30/81	_	06/30/80 06/30/81 Natl Union Fire Pttsbrgh	06/30/80 06/30/81 Winterthur Swiss Ins. Co.	06/30/81	06/30/81	06/30/81	06/30/80 06/30/81 Harford Insurance	06/30/81	06/30/80 06/30/81 Transit Casualty	06/30/80 06/30/81 Lexington Ins. Co.	06/30/80 06/30/81 Walbrook Ins. Co. Ltd.	06/30/81	06/30/81 Mutual Reinsurance Co. Ltd.	06/30/81 Bermuda Fire & Marine Ins. Co.	06/30/81	06/30/81	U0/30/80 U0/30/81 Cie Europeene D'Ass. industrielles
462023810 XLX1437060 9910362 H0001428	/5102423 SE6073646 FU78819413180	10XS100988	SCU955568	0052	6480-5016 6MX00656	9910362.	EL794416	63006855	SCU955567	80DD1645C	XL201688	80DD1645C	•		80DD1843C			75102422	9910362	80DD1645C	80DD1645C	80DD1645C	80DD1645C	10XS100990	80DD1644C	SCU955566	80DD1644C	80DD1644C	•		Ltd. 80DD1644C	80DD1644C		S 000010440
4464	\$ 1,500,000 \$ 2,000,000 \$ 2,000,000		ည	\$ 3,000,000	ນຸα	න		\$ 7,000,000	\$ 5,000,000		~	\$ 47,100	\$ 20,680	\$ 19.520	\$ 11,480		2	\$ 2,000,000	\$ 1,000,000	\$ 28,780	\$ 26,460	\$ 17,240		\$ 1,500,000										\$ 44,030
Excess Liability Excess Liability Excess Liability Excess Liability Excess Liability	Excess Liability Policy  Excess Liability Policy  Excess Liability Policy	Excess Liability	Excess Liability		Excess Liability	Excess Liability	Excess Liability	Excess		Excess Liability	Excess Liability		Excess Liability	Excess	Excess Liability Policy		Excess Liability	Excess Liability	Excess		Excess	Excess		Excess Liability Policy	Excess	Excess	Excess	Excess Liability	Excess	Excess			m	EXCESS EIGDING FORCY

ω N	80DD1643C \$ 80DD1643C \$ 80DD1643C \$ 80DD1643C \$ 63008153 \$	Lexington Ins. Co. Walbrook Ins. Co. Ltd. English & American Ins. Co. Ltd. Lloyds Underwriters Northbrook Ins Co	06/30/82 06/30/82 06/30/82 06/30/82 06/30/82	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81
641,649 1,000,000	80DD1643C 80DD1643C \$CU955978	Bermuda Fire & Marine Ins. Co. Ltd.  Mutual Reinsurance Co. Ltd.  Transit Casualty	06/30/82 06/30/82 06/30/82	06/30/81 06/30/81 06/30/81
		Bryanston Ins. Co. Ltd.	06/30/82	06/30/81
105,/35 356.196	80DD1643C \$	Cle Europeene D'Ass. Industrielles	06/30/82	06/30/81
4.		Granite State Ins	06/30/82	06/30/81
892,971	80DD1643C \$	Winterthur Swiss Ins. Co.	06/30/82	06/30/81
820,988		Kraft Ins. Co. Ltd.	06/30/82	06/30/81
534,914		St. Katherine Ins. Co. Ltd.	06/30/82	06/30/81
1,922,000	/9DD1633C	Walbrook Ins. Co. Ltd.	06/30/82	06/30/81
1,000,000		Northbrook Ins Co	06/30/82	06/30/81
467,600	79DD1633C	Mutual Reinsurance Co. Ltd.	06/30/82	06/30/81
441,600	79DD1633C \$	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/82	06/30/81
259,600	79DD1633C \$	El Paso Ins. Co. Ltd.	06/30/82	06/30/81
519,600		Kraft Ins. Co. Ltd.	06/30/82	06/30/81
389,600		St. Katherine Ins. Co. Ltd.	06/30/82	06/30/81
10,000,000	01XN2669WCA	Aefna Casualty & Surety	06/30/81	06/30/80
5,000,000	(81) 7922-7298	Federal Insurance Co	06/30/81	06/30/80
1,769,300	80DD1647C	Lexington Ins. Co.	06/30/81	06/30/80
1,238,900	80DD1647C \$	North Atlantic Ins. Co. Ltd.	06/30/81	06/30/80
1,000,000	KJ10029	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/81	06/30/80
	80DD1647C \$	Dominion Ins. Co. Ltd.	06/30/81	06/30/80
10,000,000	RDX1784981	Continental Casualty Co.	06/30/81	06/30/80
5,000,000	9910362	Natl Union Fire Pttsbrgh	06/30/81	06/30/80
4,000,000		Fireman's Fund	06/30/81	06/30/80
1,000,000	13680	European General	06/30/81	06/30/80
1,000,000		Haftpflichtverband	06/30/81	06/30/80
708,500	80DD1647C \$	Stronghold Ins. Co. Ltd.	06/30/81	06/30/80
2,000,000		Hartford Insurance	06/30/81	06/30/80
5,000,000	(81) 7922-7260 \$	Federal Insurance Co	06/30/81	06/30/80
5,000,000	5 (CITY)	Home Insurance Co	06/30/81	06/30/80
	C	Associated International	06/30/81	06/30/80
3,000,000	XL706665 \$	Midland Insurance Co	06/30/81	06/30/80
	ř	Lloyds Underwriters	06/30/81	06/30/80
1,500,000	KJ10029 \$	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/81	06/30/80
1,500,000	Z1B7434/5 \$	Zurich Insurance Co	06/30/81	06/30/80

06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81
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Granite State Ins American Centennial Gibraltar Cas. Co. Ideal Mutual Transit Casualty Hartford Insurance Birmingham Fire Ins Co Fireman's Fund	Mutual Reinsurance Co. Ltd. Walbrook Ins. Co. Ltd. Integrity Insurance Co Lloyds Underwriters Transit Casualty Northbrook Ins Co Natl Union Fire Pttsbrgh	Stronghold Ins. Co. Ltd.  Natl Union Fire Pttsbrgh American Int'l Underwriter Granite State Ins Cie Europeene D'Ass. Industrielles Bryanston Ins. Co. Ltd. El Paso Ins. Co. Ltd. Bermuda Fire & Marine Ins. Co. Ltd.	Walbrook Ins. Co. Ltd. Walbrook Ins. Co. Ltd. Lexington Ins. Co. Transit Casualty Lloyds Underwriters Gerling Konzern Ins Hartford Insurance Louisville Ins. Co. Ltd. Winterthur Swiss Ins. Co. Kraft Ins. Co. Ltd.	Louisville Ins. Co. Ltd. Winterthur Swiss Ins. Co. Stronghold Ins. Co. Ltd. Kraft Ins. Co. Ltd. Kraft Ins. Co. Ltd. American Int'l Underwriter Granite State Ins Cie Europeene D'Ass. Industrielles Bryanston Ins. Co. Ltd. El Paso Ins. Co. Ltd. Bermuda Fire & Marine Ins. Co. Ltd. Mutual Reinsurance Co. Ltd. Bermuda Fire & Marine Ins. Co. Ltd. Remuda Fire & Marine Ins. Co. Ltd.
6481-5223 CC002418 GMX01275 0076 SCU955981 10XS102370 SE6073657 XLX1481490	PY030281 PY030281 XL203279 PY030281 SCU955980 63008154 9602931.	PY030281 9602931 75-102642 6481-5222 PY030281 PY030281 PY030281	PY030181 PY030181 PY030181 SCU955979 PY030181 49/6409/01 10XS102369 PY030281 PY030281 PY030281	PY030181 PY030181 PY030181 75-102641 6481-5221 PY030181 PY030181 PY030181 PY030181 PY030181
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8,500,000 1,000,000 2,500,000 3,000,000 3,000,000 1,000,000 2,000,000 4,000,000	12,006 30,995 2,000,000 3,652,000 5,000,000 7,000,000	232,000 1,000,000 2,000,000 4,000,000 2,668 6,670 10,336 10,660	1,500,000 1,328 2,1332 2,1332	178,186 296,718 430,800 474,903 2,000,000 6,000,000 6,000,000 148,488 230,092 237,323 267,278
Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	

06/30/82 06/30/82 06/30/82 06/30/82 06/30/82 06/30/82	06/30/82 06/30/82 06/30/82 06/30/82 06/30/82	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 11/01/81 11/01/81 06/30/82	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81	06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81 06/30/81
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Transit Casualty Walbrook Ins. Co. Ltd. Louisville Ins. Co. Ltd. Winterthur Swiss Ins. Co. Kraft Ins. Co. Ltd. Granite State Ins	Winterthur Swiss Ins. Co. Kraft Ins. Co. Ltd. Cie Europeene D'Ass. Industrielles Bermuda Fire & Marine Ins. Co. Ltd. Mutual Reinsurance Co. Ltd.	Integrity Insurance Co Home Insurance Co Mission Insurance Co GEICO CNA Reinsurance of London Ltd. Lexington Ins. Co. Louisville Ins. Co. Ltd.	Bermuda Fire & Marine Ins. Co. Ltd.  Zurich Insurance Co Home Insurance Co Protective Nat'l Ins Co Federal Insurance Co London Guarantee & Acc American Int'l Underwriter Fireman's Fund Continental Ins Co	Associated International Associated International Federal Insurance Co Hartford Insurance Fireman's Fund Natl Union Fire Pttsbrgh Continental Casualty Co. Buffalo Reinsurance Bermuda Fire & Marine Ins. Co. Ltd.	Centennial Ins Co Natl Union Fire Pttsbrgh Transit Casualty Allianz Underwriters Ins Lloyds Underwriters Bermuda Fire & Marine Ins. Co. Ltd. Midland Insurance Co Zurich Insurance Co Zurich Insurance Co
W1017302 WMB950239 KY017582 KY017782 KY017782 KY017782 6482-5442	KY017582 KY017582 KY017582 KY017582 KY017582	XL203280 HEC1198525 (CITY) M877286 GXU30031 KY003382 KY003382 KY017582	XJ 10040 ZIB7632-81-C HEC1198526 (CITY) XUB1806925 (82) 7922-7298 LX3193640 75-102643 XLX1481492 SRX3193093	AEL00208C (82) 7922-7260 10XS102371 XLX1481491 9602931 RDX1784981 BR507551	462021419 9602931 SCU955982 H0001428 PY030381 KJ10040 XL724449 ZIB7631-81-C
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Excess Liability Policy	Liability Liability Liability Liability Liability Liability	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy

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Transit Casualty American Centennial Lloyds Underwriters Hartford Insurance London Guarantee & Acc	Midland Insurance Co Ideal Mutual Zurich Insurance Co	Guarantee Insurance Co Allianz Underwriters Ins	Centennial ins Co Granite State Ins Natl Union Fire Pttsbrgh	Fireman's Fund	Hartford Insurance	Transit Casualty	Lloyds Underwriters	Integrity Insurance Co	El Paso Ins. Co. Ltd.  Walbrook Ins. Co. Ltd.	Mutual Reinsurance Co. Ltd.	Bermuda Fire & Marine Ins. Co. Ltd.	Guarantee Insurance Co	Granite State Ins	American Int'l Underwriter	Kraft Ins. Co. Ltd.	Stronghold Ins. Co. Ltd.	Winterthur Swiss Ins. Co.	Louisville Ins. Co. Ltd.	Transit Casualty	English & American Ins. Co. Ltd.	Lexington Ins. Co.	Lloyds Underwriters	El Paso Ins. Co. Ltd.	Mutual Reinsurance Co. Ltd.	Cie Europeene D'Ass. Industrielles Bermuda Fire & Marine Ins. Co. Ltd.	
SCU956261 CC005317 KY017982 10XS102370. LX1898010	XL739548 XL739548 0109 ZIB7631-82-C	SL0950031 C7300025 KY017082	462023979 6482-5444 9603133.	XLX1532474	10XS102369.	SCU956260	KY017882 KY017882	XL204091	KY01/882 KY017882	KY017882	KY017882	SL0950030 KY017882	6482-5443	75102158	KY017882 0603133	KY017882	KY017882	KY017882	SCI 1956259	KY017782	KY017782	KY017782	KY017782	KY017782	KY017782 KY017782	
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	3,000,000 3,500,000	3,000,000	4,000,000 13,500,000 16,000,000	4,000,000	1,500,000	14,000,000	2,348,800 8,368,000	2,000,000	483,836 1,403,349	435,677	387,519	500,000 96,767	10,000,000	4,000,000	847,051	782,400	483,836	362,764	4 750 000	1,793,250	1,344,375	940,500	770,977	694,237	154,195 617.498	
	Excess Liability Policy Excess Liability Policy Excess Liability Policy		Excess Liability Policy Excess Liability Policy				Excess Liability Policy	Excess	Excess Liability Policy	Excess Liability Policy		Excess Liability Policy	Excess Liability Policy	Excess Liability Policy		Liability	Liability	Excess Liability	Excess Liability Policy	Excess Liability	Excess Liability	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy  Excess Liability Policy	

\$ 495,082 Excess Liability Policy	KY048183	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/84	06/30/83
123,627 Excess Liability	KY048183	Cie Europeene D'Ass. Industrielles	06/30/84	06/30/83
370,880 Excess	KY048183	Ludgate Ins. Co. Ltd.	06/30/84	06/30/83
10.000.000 Excess	6483-5667	Granite State Ins	06/30/84	06/30/83
Excess Liability	75103044	American Int'l Underwriter	06/30/84	06/30/83
1,082,165 Excess Liability	KY048183	Kraft Ins. Co. Ltd.	06/30/84	06/30/83
1,000,000 Excess	9607141	Natl Union Fire Pttsbrgh	06/30/84	06/30/83
1,000,000 Excess Liability	KY048183	Stronghold Ins. Co. Ltd.	06/30/84	06/30/83
	KY048183	Winterthur Swiss Ins. Co.	06/30/84	06/30/83
500,000 Excess Liability	SE6074145	Birmingham Fire Ins Co	06/30/84	06/30/83
\$ 463,456 Excess Liability Policy	KY048183	Louisville Ins. Co. Ltd.	06/30/84	06/30/83
,750,000 Excess Liability	SCU956535	Transit Casualty	06/30/84	06/30/83
	KY017782	Walbrook Ins. Co. Ltd.	06/30/84	06/30/83
1,793,250 Excess Liability	KY017782	English & American Ins. Co. Ltd.	06/30/84	06/30/83
\$ 1,344,375 Excess Liability Policy	KY017782	Lexington Ins. Co.	06/30/84	06/30/83
940,500 Excess Liability	KY017782	Lloyds Underwriters	06/30/84	06/30/83
\$ 770,977 Excess Liability Policy	KY017782	El Paso Ins. Co. Ltd.	06/30/84	06/30/83
\$ 694,237 Excess Liability Policy	KY017782	Mutual Reinsurance Co. Ltd.	06/30/84	06/30/83
	KY017782	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/84	06/30/83
Excess	KY017782	Cie Europeene D'Ass. Industrielles	06/30/84	06/30/83
4,000,000 Excess Liability	6483-5666	Granite State Ins	06/30/84	06/30/83
Excess Liability	KY017782	Kraft Ins. Co. Ltd.	06/30/84	06/30/83
770,977 Excess Liability	KY017782	Winterthur Swiss Ins. Co.	06/30/84	06/30/83
Excess	KY017782	Louisville Ins. Co. Ltd.	06/30/84	06/30/83
Excess Liability	KY017582	Walbrook Ins. Co. Ltd.	06/30/84	06/30/83
Excess	UMB950239	Transit Casualty	06/30/84	06/30/83
Excess	KY017582	El Paso Ins. Co. Ltd.	06/30/84	06/30/83
Excess Liability	KY017582	Mutual Reinsurance Co. Ltd.	06/30/84	06/30/83
344,400 Excess Liability	KY017582	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/84	06/30/83
Excess	KY017582	Cie Europeene D'Ass. Industrielles	06/30/84	06/30/83
752,800 Excess	KY017582	Kraft Ins. Co. Ltd.	06/30/84	06/30/83
430,000 Excess	KY017582	Winterthur Swiss Ins. Co.	06/30/84	06/30/83
322,400 Excess	KY017582	Louisville Ins. Co. Ltd.	06/30/84	06/30/83
10,000,000 Excess	GXU30152	GEICO	06/30/83	06/30/82
10,000,000 Excess Liability	HEC1199602	Home Insurance Co	06/30/83	06/30/82
5,000,000 Excess	M885801	Mission Insurance Co	06/30/83	06/30/82
5,000,000 Excess Liability	XUB1807108	Protective Nat'l Ins Co	06/30/83	06/30/82
3,000,000 Excess Liability	XL204091.	Integrity Insurance Co	06/30/83	06/30/82
15,000,000 Excess	SRX1591702	Continental Ins Co	06/30/83	06/30/82
\$ 11,000,000 Excess Liability Policy	XLX1532475	Fireman's Fund	06/30/83	06/30/82
10,000,000 Excess	BR508040	Buffalo Reinsurance	06/30/83	06/30/82
10,000,000 Excess	RDX1785056	Continental Casualty Co.	06/30/83	06/30/82
Excess	9603133	Natl Union Fire Pttsbrgh	06/30/83	06/30/82
\$ 7,000,000 Excess Liability Policy	75102159	American Int'l Underwriter	06/30/83	06/30/82

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Protective Nat'l Ins Co Republic Insurance Co Royal Insurance Co GEICO Twin City Fire Ins Co Pacific Employers Ins Co	Fireman's Fund Continental Ins Co Midland Insurance Co INA	National Casualty Co. or America Natl Union Fire Pttsbrgh London Guarantee & Acc Illinois National American Int'l Underwriter Continental Casualty Co.	Century Indemnity Co Transit Casualty American Centennial Lloyds Underwriters Hartford Insurance	Nati Union Fire Pttsbrgh Granite State Ins Allianz Underwriters Ins British National Ins. Co. Ltd. Lexington Ins. Co. Royal Insurance Co Midland Insurance Co Republic Insurance Co	Lloyds Underwriters Transit Casualty Gerling Konzern Ins Hartford Insurance Dairyland Insurance Co Birmingham Fire Ins Co Birmingham Fire Ins Co Fireman's Fund	Mutual Reinsurance Co. Ltd. El Paso Ins. Co. Ltd. Walbrook Ins. Co. Ltd. British National Ins. Co. Ltd. Integrity Insurance Co
XUB1807216 CDE0750 ED102071 GXU30267 97CXS100005 XM0017204	XLX1532228 SRX1591976 XL748919 XCP145667	X000004Z 9607141 LX2107836 886-7134 75103045 RDX1785096	CID-10-031-03-C CIZ426249 SCU956537 CC015780 KY048283 10XS102370.	9607141. 6483-5668 C7300025 KY048283 KY048283 ED102071. XL748917 CDE0749 718-70-631-83-C	KY048183 SCU956536 49/6409/01. 10XS102369. XL17275 SE6074116 SE6074146 XLX1532227	KY048183 KY048183 KY048183 KY048183 XL207784 KY048183
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5,000,000 Excess Liability Policy 6,600,000 Excess Liability Policy 7,400,000 Excess Liability Policy 10,000,000 Excess Liability Policy 5,000,000 Excess Liability Policy 250,000 Excess Liability Policy	Excess Liability Excess Liability Excess Liability Excess Liability	5,000,000 Excess Liability Policy 5,000,000 Excess Liability Policy 5,000,000 Excess Liability Policy 5,000,000 Excess Liability Policy 7,000,000 Excess Liability Policy 8,000,000 Excess Liability Policy	Excess Excess Excess	Excess Liability	Excess Liability	556,608 Excess Liability Policy 618,134 Excess Liability Policy 1,421,995 Excess Liability Policy 2,000,000 Excess Liability Policy 2,000,000 Excess Liability Policy 3,000,000 Excess Liability Policy

一	2,000,000	XL208627	Integrity Insurance Co	06/30/85	06/30/84
	ب ر		British National Ins. Co. Ltd.	06/30/85	06/30/84
	1,372,236	KY048183 \$	Walbrook Ins. Co. Ltd.	06/30/85	06/30/84
Excess		XL770372 \$	Midland Insurance Co	06/30/85	06/30/84
i04 Excess Liability	596,504	KY048183 \$	El Paso Ins. Co. Ltd.	06/30/85	06/30/84
		KY048183	Mutual Reinsurance Co. Ltd.	06/30/85	06/30/84
	477,758	KY048183 \$	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/85	06/30/84
101 Excess Liability		KY048183 \$	Cie Europeene D'Ass. Industrielles	06/30/85	06/30/84
02 Excess Liability	\$ 357,902	KY048183 \$	Ludgate Ins. Co. Ltd.	06/30/85	06/30/84
00 Excess Liability Policy		7928-26-20 \$	Federal Insurance Co	06/30/85	06/30/84
00 Excess Liability Policy	10,000,000	522-036121-5 \$	International Insurance	06/30/85	06/30/84
Excess	Çī	75103845 \$	American Int'l Underwriter	06/30/85	06/30/84
00 Excess Liability Policy		6484-5866 \$	Granite State Ins	06/30/85	06/30/84
)00 Excess Liability Policy		9607216 \$	Natl Union Fire Pttsbrgh	06/30/85	06/30/84
Excess		SE6074398 \$	Birmingham Fire Ins Co	06/30/85	06/30/84
197 Excess Liability Policy		KY048183 \$	Kraft Ins. Co. Ltd.	06/30/85	06/30/84
		KY048183 \$	Winterthur Swiss Ins. Co.	06/30/85	06/30/84
i00 Excess Liability Policy	482,500	KY048183 \$	Ancon Ins. Co. (U.K.)	06/30/85	06/30/84
Excess	482,500	KY048183 \$	Folksam International Ins. Co. Ltd.	06/30/85	06/30/84
Excess		KY048183 \$	Louisville Ins. Co. Ltd.	06/30/85	06/30/84
91 Excess Liability Policy		KY017782 \$	Walbrook Ins. Co. Ltd.	06/30/85	06/30/84
Excess		KY017782 \$	English & American Ins. Co. Ltd.	06/30/85	06/30/84
175 Excess Liability Policy	1,344,375	KY017782 \$	Lexington Ins. Co.	06/30/85	06/30/84
Excess		SCU956881 \$	Transit Casualty	06/30/85	06/30/84
		KY017782 \$	Lloyds Underwriters	06/30/85	06/30/84
Excess	770,977		El Paso Ins. Co. Ltd.	06/30/85	06/30/84
Excess		KY017782 \$	Mutual Reinsurance Co. Ltd.	06/30/85	06/30/84
		KY017782 \$	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/85	06/30/84
		KY017782 \$	Cie Europeene D'Ass. Industrielles	06/30/85	06/30/84
Excess	4,750,000	6484-5867 \$	Granite State Ins	06/30/85	06/30/84
		XCC012283 \$	Pacific Employers Ins Co	06/30/85	06/30/84
Excess	1,349,747	KY017782 \$	Kraft Ins. Co. Ltd.	06/30/85	06/30/84
Excess		RDX1784529 \$	Continental Casualty Co.	06/30/85	06/30/84
Excess	770,977	KY017782 \$	Winterthur Swiss Ins. Co.	06/30/85	06/30/84
53 Excess Liability Policy	578,053	KY017782 \$	Louisville Ins. Co. Ltd.	06/30/85	06/30/84
O Excess Liability Policy	1,247,200	KY017582 \$	Walbrook Ins. Co. Ltd.	06/30/85	06/30/84
00 Excess Liability Policy	750,000	UMB950239. \$	Transit Casualty	06/30/85	06/30/84
Excess	430,000	KY017582 \$	El Paso Ins. Co. Ltd.	06/30/85	06/30/84
Excess			Mutual Reinsurance Co. Ltd.	06/30/85	06/30/84
Excess	344,400	KY017582 \$	Bermuda Fire & Marine Ins. Co. Ltd.	06/30/85	06/30/84
		KY017582 \$	Cie Europeene D'Ass. Industrielles	06/30/85	06/30/84
	752,800	KY017582 \$	Kraft Ins. Co. Ltd.	06/30/85	06/30/84
			Winterthur Swiss Ins. Co.	06/30/85	06/30/84
00 Excess Liability Policy	322,400	KY017582 \$	Louisville Ins. Co. Ltd.	06/30/85	06/30/84

	06/30/84 06/30/85 06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 06/30/85		06/30/84 06/30/85		06/30/84 06/30/85		06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 05/17/85	06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 06/30/85		06/30/84 06/30/85	•		4		•	_	•		_					•	-	06/30/84 06/30/85	06/30/84 06/30/85	06/30/84 06/30/85			06/30/84 06/30/85
First State Ins Co New England Reins Corp	Royal Insurance Co Aetna Casualty & Surety	California Union Ins Co	Allianz Ungerwriters Ins	Gibraltar Cas. Co.	Home Insurance Co	Federal Insurance Co	Transit Casualty	Continental Ins Co	Pacific Insurance Co	Fireman's Fund	Continental Casualty Co.	Natl Union Fire Pttsbrgh	Atlanta Int'l Ins Co	Transport Indemnity	Safety Mutual Cas. Co	Industrial Indemnity	Evanston Insurance Co	Arab Insurance Group	Transamerica Ins Co.	Zurich Insurance Co	New England Reins Corp	Hartford Insurance	Transit Casualty	Midland Insurance Co	Lloyds Underwriters	Republic Insurance Co	Royale Beige S.A.	American Centennial	Allianz Underwriters Ins	Wausau Insurance Co	London Guarantee & Acc	American Int'l Underwriter	Industrial Indemnity	Granite State Ins	Birmingham Fire Ins Co	Evanston Insurance Co	Haftpflichtverband	Transamerica Ins Co.	Zurich Insurance Co	Lloyds Underwriters
EU001538 NE000082	ED102834 01XN4270WCA	ZCX007225	AUX5203042	GMX02683	HXL1638423	7928-26-20.	SCU956883	SRX1592218	P133100	XLX1688067	RDX1784530	9607216.	XL06282	TEL00909C	UF1257NY	JE8843127	EX11453	3900077100	USE13397798	ZIB70631-84-C	NE000081	10XS103326	SCU956882	XL770373	KY048283	CDE1000	1251427	CC015996	C7300025	573500101008	LX2110809	75103864	JE8843126	6484-5890	SE6074318	EX11452	EWI1067	USE13397786	ZIB70964-84-C	KY048183
	\$ 10,000,000 \$ 19.875.000	\$ 10,000,000				\$ 2,000,000	\$ 2,000,	\$ 12,000,000	\$ 10,000,000	\$ 10,000,000	\$ 8,500,000	\$ 5,125,000	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000	\$ 3,000,000	\$ 1,500,000	\$ 1,000,000	\$ 3,500,000	\$ 1,500,000	\$ 3,000,000		\$ 6,000,000	\$ 5,250,000	\$ 5,000,000	\$ 1,125,000	_							\$ 2,000,000	\$ 2,000,			\$ 6,500,000	\$ 3,618,629
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Excess Liability Policy Excess Liability Policy	Excess Liability Policy  Excess Liability Policy	Excess Liability Policy		Liabilit)	Excess Liability Policy		Excess Liability Policy	xcess			Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Liability	Excess Liability Policy	Excess Liability Policy	Liability	Excess Liability Policy	Liability	Liability	Excess Liability Policy	Excess Liability Policy	Liability	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy	Excess Liability Policy					

05/17/85 06/30/85 Atlanta Int'l Ins Co

XL06282

\$ 4,000,000 Excess Liability Policy

## **EXHIBIT B**

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11
W. R. GRACE & CO., et al.,	) Case No. 01-01139 (JKF) ) Jointly Administered
Debtors.	)
W. D. CDACE & CO. et al.	
W. R. GRACE & CO., et al.,	<b>`</b>
Plaintiffs,	)
v.	) Adversary No. A-01-771
MARGARET CHAKARIAN, et al., And John Does 1-1000,	) Re: Docket No. 208 ) 7/6/04 Agenda Item 1
Defendants.	)

ORDER DENYING THE EXPEDITED MOTION OF THE SCOTTS COMPANY FOR AN ORDER (I) ENFORCING THE DEBTORS' PRELIMINARY INJUNCTION AND AUTOMATIC STAY TO ENJOIN PROSECUTION OF CERTAIN ASBESTOS-RELATED ACTIONS AGAINST THE SCOTTS COMPANY AND (II) FINDING ALL SUCH ACTIONS COMMENCED POST-PETITION TO BE VOID AB INITIO

Upon consideration of the Expedited Motion of the Scotts Company ("Scotts") for an Order Under 11 U.S.C. §§105(a) and 362(a): (i) Enforcing this Court's January 22, 2002 Order Granting the Debtors' Modified Preliminary Injunction; (ii) Enforcing the Debtors' Automatic Stay to Enjoin Prosecution of Certain Asbestos-Related Actions Against the Scotts Company; and (iii) Finding All Such Actions Commenced Post-Petition to be Void *Ab Initio* (the "Motion"); and the Court having considered the Motion; and due and proper notice having been given with no other notice being required; and in light of the nature of the relief requested in the Motion, no further notice or hearing on the Motion being required;

## IT IS HEREBY ORDERED THAT:

1. The Motion is denied, subject to the following additional provisions.

## PRIVILEGED AND CONFIDENTIAL ATTORNEY WORK PRODUCT

- 2. The Insurance Carriers as to which Scotts makes a claim on shared insurance are prohibited from paying those claims until the issue of coverage is litigated in an appropriate forum.
- 3. Unless the Debtors voluntarily consent, the Debtors shall not be required to participate in discovery or as witnesses at trial in any action in which Scotts is a party, until the Debtors have filed a plan of reorganization in October 2004.
- 4. Nothing in this Order shall affect Scotts' right to take advantage of the offer to have a tolling agreement or to be dismissed without prejudice or to seek an order of continuance in pending state actions from trial courts until the Debtors' plan of reorganization is filed in October 2004.
- This Order shall have no effect on either the Debtors' automatic stay or the Modified Preliminary Injunction.
- 6. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order, which is final.

Dated: July <u>22</u>, 2004

The Honorable Judith K. Fitzgerald United States Bankruptcy Judge

Judith K. Titzgerald

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As defined in this Court's January 22, 2002 Order Granting Modified Preliminary Injunction in the above-capitioned adversary proceeding (the "Modified Preliminary Injunction").